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## LAWLER, METZGER & MILKMAN, LLC

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April 13, 200 GERAL COMPARIANCE TICHS COMMISSION

BY HAND

VALERIE YATES

DIRECT (202) 777-7723

Magalie Roman Salas, Secretary Federal Communications Commission 445 Twelfth Street, S.W. Suite TW-A325 Washington, D.C. 20554 REDACTED -FOR PUBLIC INSPECTION

Re:

Applications of Sprint Corporation, Transferor, and MCI WorldCom, Inc., Transferee, for Consent to Transfer Control of Corporations Holding Commission Licenses and Authorizations Pursuant to Sections 214 and 310(d) of the Communications Act and Parts 1, 21, 24, 25, 63, 73, 78, 90, and 101, CC Docket No. 99-333

Dear Ms. Salas:

This letter is to inform the Commission for the public record that, on behalf of MCI WORLDCOM, Inc., ("MCI WorldCom"), undersigned counsel transmitted to the Commission certain documents requested by the Commission's staff. Specifically, we provided descriptions of the products offered by the business units of MCI WorldCom. In addition, under separate cover, we provided confidential documents filed under seal and subject to the Protective Order adopted by the Common Carrier Bureau for this proceeding. In accordance with the requirements of the Protective Order, the confidential documents submitted to the Commission were stamped "CONFIDENTIAL - NOT FOR PUBLIC INSPECTION, SUBJECT TO PROTECTIVE ORDER IN CC Docket No. 99-333" and "Copying Prohibited."

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Applications of Sprint Corporation, Transferor, and MCI WorldCom, Inc., Transferee, for Consent to Transfer Control of Corporations Holding Commission Licenses and Authorizations Pursuant to Sections 214 and 310(d) of the Communications Act and Parts 1, 21, 24, 25, 63, 73, 78, 90, and 101, CC Docket No. 99-333, *Order Adopting Protective Order*, DA 00-186 (CCB Feb. 2, 2000) at ¶ 2 and Appendix A ("Protective Order").

LAWLER, METZGER & MILKMAN, LLC April 13, 2000 Page 2

An original and one copy of this letter is submitted herewith in accordance with Section 1.206(b) of the Commission's rules. The confidential submission has been redacted in its entirety from this public filing.

Sincerely,

Valerie Yates

Vale Jate

Enclosures

cc: Christopher Libertelli

MCI WorldCom	Description
Product Access	A local connection between a customer's premises and a carrier's POP (Point-of-Presence). The POP is the carrier's switching central office. The carrier might be a local or long distance carrier.
	Access supports all products available domestically, and can be economically bundled in every state domestically.
	There are two types of access, switched and dedicated.
	Switched: Switched Analog Access Common Business Line (CBL) Direct Inward and Outward Dialing Centrex Foreign Exchange Switched Digital Access
	Dedicated: Analog DS-0/DDS T-1/DS-1 Access DS-3 Access OCX Access
Advanced Communication Services (ACS)	MCI WorldCom Advanced Communication Services (ACS) is a managed service that allows customers to remotely broadcast important information or conduct valuable training across the Internet to a user's desktop workstation.
ATM	Asynchronous Transfer Mode (ATM) service is a technology and protocol structure that integrates data, voice, and video over the same communication channel while offering a variety of access speeds and multiple service categories.
	Products available under the ATM umbrella include:
	Domestic ATM International ATM Metro ATM Digital Video Services
Audio Conferencing	A vehicle for conference participation in which individuals in remote locations communicate simultaneously via telephone lines.
Calling Card	Provides toll-free access from anywhere in the United States, including Alaska, Hawaii, Puerto Rico, and the U.S. Virgin Islands to many direct-dial countries worldwide.
Circuit View	Provides customers visibility into the historical information of the frame relay network from customer premises to customer premises Analysis Service Elements (ASE).

MCI WorldCom Product	Description
Concert Inbound Service	Provides multinational corporations with an advanced set of inbound network routing feature capabilities to manage their international call center.
Customer Interaction Solutions (CIS)	A comprehensive suite of network products, managed services, customer relationship consulting, and web business management outsourcing services. CIS helps customers transform their call centers into contact centers and implement Customer Relationship Management strategies.
	Products available under CIS umbrella include:  Call Manager Click'N Connect Custom Call Routing (CCR)
	<ul> <li>Enhanced Call Routing (ECR)</li> <li>Gateway</li> <li>InnovAgent</li> <li>Support PIN</li> </ul>
Domestic Toll Free	Allows both domestic and global callers to reach our customers without incurring a charge for the call.
	Products available under the Domestic Toll Free umbrella include: Dealer Locator 800 Network Manager AnswerNet Live Enhanced Call Router
E-Business Services	MCI WorldCom <sup>sm</sup> E-Business Services use the Internet to streamline and maximize business communications. MCI WorldCom's network, advanced Web hosting, data center infrastructure, and strong partnerships position MCI WorldCom to deliver a total e-business solution to customers.
EDI*Net	EDI*Net is the Electronic Data Interchange (EDI) Value-Added Network (VAN) service offered by MCI WorldCom. EDI*Net is a secure and reliable communications and document mailboxing service that facilitates the flow of standard formatted business documents between trading partners. It is a store-and-forward, store-and-retrieve service that offers full network connectivity, including frame relay and Internet access.
Enterprise Blue	Enterprise Blue is a comprehensive suite of services designed to provide the migration platform and strategies to move legacy SNA (Systems Network Architecture) networks to a single network that integrates SNA, IP, and all protocols. It offers customers an end-to-end solution - transport, CPE, design, and management - for all their networking needs, including mission-critical SNA applications.

WorldCom   Product	MCI	Description
Frame Relay  High-speed communications technology used in hundreds of networks throughout the world to connect LAN, SNA, Internet and even voice applications. MCI WorldCom has a family of Frame Relay services which provide a virtual private data network for MCI WorldCom business customers locally, nationally and across the globe.  Products available under the Frame Relay umbrella include:  Domestic Frame Relay Services: Voice over Frame Relay (VoFR)  ATM Service Interworking Network to Network Interface (NNI) Auto Enable Peak Information Rate Priority PVC Permanent Virtual Circuits (PVC) Redirect Switched Virtual Circuits (SVC) International Frame Relay Services (IFRS)  Global ISDN  MCI WorldCom's Global Integrated Services Digital Network (Global ISDN) is a digital network service capable of supporting multiple services on a single connection using a common set of well-defined protocols.  Global Voice Virtual Private Network (VPN)  A global outbound voice product that seamlessly extends domestic Virtual Private Network (VPN) services to Europe, Asia/Pacific and Latin America. VPN is considered "virtual" because it is software-defined and managed, whereas actual private network is hardware-managed.  GVV's circuit switched network solution allows multinational corporations to link their worldwide sites together for transmission of voice, fax, and low speed data traffic.  International  Oli Free Communications services  International  Toli Free Communications services  International  Toli Free Communications services  Internat Access Services  Internat Access Services  Internat Cacess Services or customers with dedicated and switched locations in both the U.S. and a number of International Direct Dial (IDDD) locations.  The categories of services customers benefit from a full range of access services: T-1, T-3/Multi-Megabit Services	WorldCom	Description
Domestic Frame Relay Services: Voice over Frame Relay (VoFR) ATM Service Interworking Network to Network Interface (NNI) Auto Enable Peak Information Rate Priority PVC Permanent Virtual Circuits (PVC) Redirect Switched Virtual Circuits (SVC) International Frame Relay Services (IFRS)  Global ISDN  MCI WorldCom's Global Integrated Services Digital Network (Global ISDN) is a digital network service capable of supporting multiple services on a single connection using a common set of well-defined protocols.  Global Voice Virtual Private Network (VPN)  A global outbound voice product that seamlessly extends domestic Virtual Private Network (VPN) services to Europe, Asia/Pacific and Latin America. VPN is considered "virtual" because it is software-defined and managed, whereas actual private network is hardware-managed.  GV's circuit switched network solution allows multinational corporations to link their worldwide sites together for transmission of voice, fax, and low speed data traffic.  International  MCI WorldCom Interact <sup>SM</sup> is a comprehensive set of Web-based communications management tools that gives customers a single entry point into a wide range of business applications. This creates a more convenient way for customers to order, provision, monitor, report, purchase and pay for their MCI WorldCom communications services.  Offers country-specific foll-free access and Universal International Freephone Number Service to customers with dedicated and switched locations in both the U.S. and a number of International Direct Dial (IDDD) locations.  Internet Access Services  Internet Access Services customers benefit from a full range of access services: T-1, T-3, Internet Gateway, Frame Relay to Internet Protocol, Asynchronous Transfer Mode to Internet Protocol (ATM to IP), Security (firewall), International Internet Access, UUlink Digital Subscriber Line (DSL), and Metropolitan Area Exchanges Asynchronous Transfer Mode (MAE ATM).  The categories of services are: T-1 T-3/Multi-Megabit Services		world to connect LAN, SNA, Internet and even voice applications. MCI WorldCom has a family of Frame Relay services which provide a virtual private data network for
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		T-1
LIDIOTOGO CIGIOWOV NICONIAGO		1
Security Services (Managed)		Internet Gateway Services Security Services (Managed)
Other Security Systems		

MCI	Description
WorldCom Product	
	MAE ATM
Internet Dial	Internet Dial provides dial-up access to the Internet or to customer applications through the UUdial suite of services from UUNET, an MCI WorldCom company.
ISDN	Integrated Services Digital Network (ISDN) is a network infrastructure enabling digital transmissions over existing telephone lines. ISDN provides end-to-end digital connectivity, eliminating the need for separate, dedicated end-user networks for voice, data, facsimile, video, and other services.
Local Service	Carries calls that begin and end within a customer's local calling area. Features include Operator Services, Directory Assistance, 911 Service, and more. Local Service has over 100 switches across the United States and 9,000 miles of fiber optic cable serving 89 facilities-based Metropolitan Statistical Areas (MSAs).
	Products available under the Local Service umbrella include:
	Local PRI (Primary Rate Interface) is an advanced digital access product to allow multiple services to be accessed over a single service arrangement.
	Business Lines is a product offering comprised of a basic communications circuit linking the Local End office (class 5 switch) to the subscriber's telephone, key system, fax machine, or modem. Business Lines is delivered via On-Ring or Analog Unbundled Loops (UBL).
	Full Service T-1 (FST-1) delivers 24 multi-use channels integrating Voice (Local and Long Distance) and Data service. A minimum of 12 digital trunks of local service and one data circuit is required on the on-net FST-1. Traditional T-1 access charges are waived for FST1 customers.
	Local Voice Mail - MCI WorldCom offers a new fully integrated, networked voice mail service nationwide. Our voice mail system is integrated so that any subscriber can send two-way voice messages without ever incurring a long distance charge. The networking component allows the Local Voice Mail system to appear seamless by linking systems together to provide customers with a network of systems in many different locations across the United States.
	Local Trunks are communication circuits between the Local End Office (class 5 switch) and the subscriber's PBX. MCI WorldCom offers Basic Trunks and trunks with DID functionality. Local Trunks can carry on-net long distance traffic. Below is a brief description of types of trunks, Basic and DIDs:
	Local Trunk Basic - MCI WorldCom offers the following Basic Trunks types:  One-Way Inbound  One-Way Outbound  Two-Way
Local Toll	Local Toll, sometimes called intraLATA or 2-PIC, are 1+ calls within a Local Access and Transport Area (LATA). Currently, customers in every state (except Alaska) can choose MCI WorldCom as their local toll provider.

MCI	Description
WorldCom Product	
Managed Services	Managed Services is a comprehensive Wide Area Network (WAN) management solution designed to provide router-based frame relay network management. The key features of the Managed Services offering include network design, implementation management, CPE monitoring, network management, change management, performance reporting, and service level guarantees.
Media Manager	MCI WorldCom Media Manager provides network-based storage, management, retrieval, and distribution of multimedia digital content (video, still images, audio, print, and graphics) across the telecommunications network. Media Manager integrates state-of-the-art software in a very modular architecture, which takes advantage of the latest Web technologies and Internet protocol standards.
Messaging Services	
SAFEfax	Customers can send documents and messages from their personal computers, local area networks (LANs), or mainframes to any Group 3 fax machine worldwide.
MCI Fax Broadcast	MCI Fax Broadcast® is the perfect tool for simultaneous delivery of thousands of faxes to both domestic U.S. and international destinations. With MCI Fax Broadcast, a single fax can be sent from a fax machine and be delivered to 10,000 recipients within minutes.
MCI Fax Reply	MCI Fax Reply® offers an affordable solution for businesses needing a simple and fast way to increase sales, provide timely information to employees or business partners or improve customer service.
MCI Never Busy Fax	MCI Never Busy Fax® is designed for customers who receive a high volume of incoming faxes. This service ensures users that their correspondents will never encounter a busy signal when faxing them.
Broadcast Fax	WorldCom <sup>SM</sup> Broadcast Fax service enables you to harness the power of fax to thousands of locations within minutes.
Fax On Demand	WorldCom <sup>SM</sup> Fax On Demand is an interactive voice and fax system that allows callers to select and retrieve stored documents using a touch-tone phone. Additionally, WorldCom Fax On Demand allows the caller to direct faxes to the fax machine or PC of their choice.
Xchange 400	MCI WorldCom Xchange 400 is MCI Mail's X.400 service that provides message exchange with X.400 electronic mail systems. It is fully integrated with MCI Mail's delivery capabilities for electronic (including Internet), telex, fax, postal and courier messages.
Managed Email	MCI WorldCom <sup>SM</sup> Managed Email provides hosted e-mail and e-mail integration services for full or partial outsourcing solutions. Hosted e-mail maintains mailboxes on MCI WorldCom servers and provides a Web-based administrator tool that allows customers to add, modify, or delete mailboxes.
MCI WorldCom Cellular	PCS or wireless cellular services.

MCI WorldCom Product	Description
Net Conferencing	Using your PC, phone, and Internet browser, you can enhance your traditional audioconference. Net Conferencing enables you to connect hundreds of people from around the world through the Internet.
Operator Services	Operator Services include any type of telephone service that needs the assistance of a voice or automated operator, such as collect calls, third-party billed calls, or person-to-person calls.
	In addition, MCI Payphone Management is an MCI Operator Services program designed to support the payphone management needs of business customers within industries such as hospitality, transportation, universities, hospitals, government agencies, retail and service.
Outbound LD	Outbound Long Distance includes domestic and international calls placed outside of the local calling area
Paging	Paging provides assured message delivery and the capability to initiate messages and replies right from the paging unit. Three products operate via the Advanced Messaging System: Enhanced One-Way, QuickReply Interactive, and Full Interactive.
Perspective	Perspective is a PC-based analysis application allowing customers to monitor and control their traffic. It provides customers with monthly extracts of their call data and lets customers access and sort the data according to their individual business needs.
Prepaid Calling Cards	Prepaid calling cards allow customers to make long distance phone calls by using minutes that are prepaid. The cards come in a variety of minute denominations and can be customized for larger customers.

MCI WorldCom Product	Description
Private Line	Dedicated circuits that connect a customer's equipment at both ends of the line. A private line only provides switching capability if it is supported by customer premises equipment. It usually includes two local loops and an interexchange carrier circuit.
	Metro Private Line: DS-0 Service DS-1 Service DS-3 Service SONET Service
	Domestic Private Line:    DS-0 Service    DS-1 Service    DS-3 Service    Fractional DS-1    SONET Service    Voice Grade Private Line Service    Web Digital Reconfiguration Services
	International Private Line:  (Global) Analog Leased Line Services Crossborder International Private Line International Fiber Service International Satellite Service Satellite Direct End to End Satellite VSAT Managed International Private Line
UUNET Internet Services	UUNET, the Internet services division of MCI WorldCom, is a world class leader in Internet communications solutions, offering a comprehensive range of Internet-based services to business customers worldwide. Providing Internet access, dial services, security services, web hosting and other value-added services, UUNET offers service in 114 countries to more than 70,000 businesses. It owns and operates an expansive, global network in thousands of cities throughout North America, Europe, and Asia.
Video Conferencing	Simultaneous, interactive images and voice communication between individuals at two or more locations.  An umbrella of services designed to meet a wide array of equipment, support, and service requirements for videoconferencing applications.

MCI WorldCom Product	Description
Virtual Private Network	A VPN is a private corporate communications network built from various transport technologies operating on public or shared networks.  MCI WorldCom offers local-to-global-to-local on-net facilities to build a comprehensive VPN with MCI WorldCom's On-net Data services:
900 Caller Paid	900 Caller Paid Service (formerly known as networkMCl Custom Rate Service) is a caller-paid inbound service that provides access to live, passive, or interactive information and entertainment.

## MCI WorldCom Wholesale Services Products

MCI WorldCom Product	Description
Access Based Billing	Access Based Billing is a fully integrated long distance service that incorporates rates by type or 'Class" of local exchange carrier within a state or LATA and by jurisdiction. Access Based Billing offers a comprehensive selection of origination and termination applications for Resellers, Carriers and LECs. Rates are based on the underlying cost structure associated with one of three LEC classes.
Toll Free - Advanced and Basic	Advanced and Basic Toll Free is an inbound service with numerous standard and advanced features including but not limited to: Dialed Number Identification, Tailored Call Coverage, Routing Features, etc.
ATM	Asynchronous Transfer Mode service is a technology and protocol structure that integrates data, voice and video over the same communications channel while offering a variety of access speeds and multiple service categories. The following Wholesale ATM Services are available:  • Domestic ATM  • ATM Service Interworking (FRASI)  • Metro ATM Service  • International ATM Service

MCI	Description
WorldCom Product	Description
Calling Card	Calling Card is an enhanced feature calling card that provides users with toll-free access from anywhere in the US to many direct-dial countries worldwide.  Enhanced features include operator assistance, Voice News Network, Conference Calling and Speed Dial.
CIC Translations	CIC Translations provide our customers with a Carrier Identification Code (CIC) translation-based network access method. The wholesale customer has the capability, through the Local Exchange Carrier (LEC) to designate MCI WorldCom's network for the routing of all calls associated with the customers CIC.
Collocate Services	Collocate Services allow customers to collocate their equipment within a MCI WorldCom facility in conjunction with Private Line, Frame Relay, ATM, Internet and Voice products. Collocate is available for domestic and international locations.
Debit Card	The debit card is a pre-paid calling card specially tailored for the wholesale customer. Standard features include custom branding, various card values, flexible activation, verbal notice of expiration, plus several optional features.
Frame Relay	Frame Relay Service is a virtual private data service that uses virtual connectivity to give users the look and feel of a private network, with the flexibility and economics of a public network. The Wholesale Frame Relay product offers customers the opportunity to brand legacy WorldCom Frame Relay Service and sell it domestically or internationally.  The following Frame Relay products are available:  Domestic Frame Relay  High Speed Frame Relay  Metro Frame Relay  International Frame Relay
International Toll Free	International Toll Free Service provides direct, toll-free connections from foreign countries to MCI WorldCom customers in the US.
Internet	There are three types of Wholesale Internet Service:  Dedicated Integrated Dial-up, also known as Virtual Internet Provided (VIP)
Portfolio	Portfolio provides MCI WorldCom customers with a comprehensive, integrated customer management tool. Portfolio allows our customers to manage their telecommunications needs from order to invoice and from local to global by providing complete order management, CDR delivery, advanced reporting and end-user management.
Operator Services	Wholesale Operator Services is available to be included with any type of wholesale Voice product. It is available with live or automated operators and for domestic or international operator services calls. There are several features that are available.
Prism I	Prism I is a one-way outgoing terminating service that provides complete domestic and international call coverage.

MCI WorldCom Product	Description
Private Line	Private Line Services are dedicated circuits that connect a customer's equipment at one end of the line and the other end to MCI WorldCom. The service usually includes at least one local loop. The Wholesale Private Line Portfolio is composed of the following Private Line Services:  Metro Private Line Voice Grade Private Line Digital Private Line Fractional DS-1 DS-1 Fractional DS-3 Sonet International Private Line includes: Correspondent Int'l Half Circuit Correspondent Int'l Private Line (Satellite) Managed Int'l Private Line Cross Border Int'l Private Line
SS7	SS7 (Signaling System 7) products offer Wholesale customers the ability to establish their call setup signaling time which is critical to driving efficiencies in their networks.  MCI WorldCom offers three types of signaling:  SS7 Direct SS7 Third Party Enhanced SS7 Direct
Transcend	The Transcend product offers a suite of services that provide end-to-end call origination and termination for switched and switchless applications. Transcend unbundles the costs of a call, which include tariffed access, tariffed egress and the transport of a call across the MCI WorldCom network.